

**REMARKS**

Claims 1-23 remain pending in the application, with claims 24-39 having been previously canceled.

The Applicants respectfully request that the Examiner reconsider earlier rejections in light of the following amendments and remarks. No new issues are raised nor is further search required as a result of the changes and remarks made herein. Entry of the Amendment is respectfully requested.

**Claims 1-12 under 35 USC 101**

Claims 1-12 were rejected as allegedly being directed to non-statutory matter as being directed to software per se.

Claims 1-12 are amended herein to stress the requirement of physical devices that include “at least one **physical** protocol **gateway**”, and “at least one **physical** registered message **router**”, and “at least one **physical** **server**”. It is respectfully requested that the rejection be withdrawn.

**Claims 1-7, 11-19, 22 and 23 over Ramasubramani, Barzegar and Sasamoto**

In the Office Action, claims 1-7, 11-19, 22 and 23 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,507,589 to Ramasubramani et al. (“Ramasubramani”) in view of U.S. Patent No. 5,894,478 to Barzegar et al. (“Barzegar”), and in further view of U.S. Patent No. 6,647,264 to Sasamoto (“Sasamoto”). The Applicants respectfully traverse the rejections.

The Applicant respectfully suggests that the need to combine THREE references to find all features of the presently claimed invention is an indication of the non-obviousness of claims 1-7, 11-19, 22 and 23.

Claims 1-7, 11-19, 22 and 23 recite, *inter alia*, a system and method of establishing a Transmission Control Protocol/Internet Protocol (TCP/IP) network connection between at least one physical registered message router and at least one physical server based on an indirect message router table that maps a message key, including at least one of a service type and a

**message identification (ID)**, to an IP address of the at least one physical server. The Examiner alleges that Ramasubramani teaches such features at col. 17, lines 34-43. (See Response to Arguments section of the Office Action, page 2)

Ramasubramani teaches:

Also, when there are multiple gateway processes of the same type (e.g., the agent-1 process 1316 and the agent-2 process 1318), then the dispatcher process 1314 performs load-balancing between the gateway processes 1312 of the same type. The network gateway 1302 also includes a route table 1322. The route table 1322 is used by the internal message router 1310 to properly route incoming messages to the appropriate ones of the gateway processes 1312 **within the network gateway** 1302. (*emphasis added*)

Ramasubramani teaches a network gateway that includes a plurality of processes within the network gateway. A routing table is used to route an incoming message to one of these processes **within the network gateway**. A **network gateway** routing table is not a **router** table, as required by the claims.

Ramasubramani's route table is used by an internal message router **within a network gateway** to route an incoming message to a process. A **network gateway table** is not a **router table**, as required by the claims. Establishing an internal connection between a receiver of the network gateway and a **process within the network gateway** is **NOT** establishing a Transmission Control Protocol/Internet Protocol (TCP/IP) network connection between at least one **physical registered message router** and at least one **physical server**, much less based on an **indirect message router table** that maps a message key, including **at least one of a service type and a message identification (ID)**, to an IP address of the at least one physical server, as recited by claims 1-7, 11-19, 22 and 23.

The Office Action alleges that "Barzegar teaches a system with a protocol gateway that establishes connections through a message router (Column 3, lines 56-58)." (See Office Action, page 5)

Barzegar teaches a "routing table 214". However, Barzegar fails to mention what this routing table maps. Barzegar fails to teach or suggest an indirect message router table that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of the at least one physical server, as recited by claims 1-7, 11-19, 22 and 23.

The Examiner alleges that Sasamoto teaches "a system for routing messages between gateways and message routers (Fig 1, elements 111 and 114) in which the gateway manages TCP/IP connections between the routers and the gateway, and which the router is registered within a router table of the gateway (Col. 5, lines 29-65; Col. 1, lines 14-20)." (see Office Action, page 5)

Sasamoto teaches:

At step 506, the gateway controller forwards the packet to the router that responded to the request message. More specifically, the controller 307 examines the destination address contained in the reply message, controls the routing circuit 304 and forwards the packet to the appropriate router via the routing circuit 205.

After transmission of the packet, the gateway controller proceeds to step 507 to store the destination address (DA), the source address (SA) contained in the packet and the router address (RA) in the routing table 305.

If no reply message is received within a predefined time interval, it is determined that the desired mobile station is not located in any of the location areas and the controller 307 terminates the routine.

If the destination address of the packet received from the data network 115 is found in the routing table 305, the decision at step 503 is affirmative and the controller 307 proceeds to step 508 to control the routing circuit 304 according to the routing data found in the routing table 305 and forwards the packet to the routing circuit 304 for transmission to the associated router.

If the gateway 114 has transmitted a search request message to each of the mobile routers to determine the actual location of the destination mobile station and if this mobile station is registered in the location register of one of the routers, this router responds to the request message from the gateway with a reply message.

When the gateway 114 receives an LA-to-LA handover request message from one of the routers, the main routine of FIG. 5A is interrupted and an interrupt routine of FIG. 5B is executed, at step 510, by updating the routing table 305 with the address of the new router to which the current communication is to be handed over. At step 511, the router performs a handover operation on the mobile station so that its communication path is switched to the new base station and the previous

path is cleared. The router then returns to the main routine (FIG. 5A). (see col. 5, lines 29-65)

Thus, Sassamoto teaches a gateway that includes a routing table that maps a message's "destination address" to "routing data". A routing table that maps a destination address of a message to routing data is not an **indirect message router table** that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of the at least one physical server, as recited by claims 1-7, 11-19, 22 and 23.

Ramasubramani, Berzegar, and Sasamoto, either alone or in combination, fail to disclose, teach or suggest a system and method of establishing a Transmission Control Protocol/Internet Protocol (TCP/IP) network connection between at least one physical registered message router and at least one physical server based on an **indirect message router table** that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of the at least one physical server, as recited by claims 1-7, 11-19, 22 and 23.

Accordingly, for at least all the above reasons, claims 1-7, 11-19, 22 and 23 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

#### **Claims 8 and 20 over Ramasubramani, Barzegar, Iwama and Boyle**

Claims 8 and 20 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Barzegar, and U.S. Patent No. 6,600,735 to Iwama et al. ("Iwama"), and in further view of U.S. Patent No. 6,119,167 to Boyle et al. ("Boyle"). The Applicants respectfully traverse the rejections.

Claims 8 and 20 are dependent upon claims 1 and 13 respectively, and are allowable for at least the same reasons as claims 1 and 13.

Claims 8 and 20 recite, *inter alia*, a system and method of establishing a Transmission Control Protocol/Internet Protocol (TCP/IP) network connection between at least one physical registered message router and at least

one physical server based on an indirect message router table that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of the at least one physical server. As discussed above, Ramasubramani, Berzegar, and Sasamoto, either alone or in combination, fail to disclose, teach or suggest such features.

The Examiner relies on Boyle to allegedly disclose a wireless protocol gateway and http proxy that creates a TCP/IP socket connection, and managing the TCP/IP connection. (See Office Action, page 8) But, Boyle fails to mention use of a router table, much less disclose, teach or suggest an indirect message router table that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of at least one physical server, as recited by claims 8 and 20.

Thus, Ramasubramani, Barzegar, Sasamoto, and Boyle, either alone or in combination, fail to disclose, teach or suggest a system and method of establishing a Transmission Control Protocol/Internet Protocol (TCP/IP) network connection between at least one physical registered message router and at least one physical server based on an indirect message router table that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of the at least one physical server, as recited by claims 8 and 20.

Accordingly, for at least all the above reasons, claims 8 and 20 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

#### **Claim 9 over Ramasubramani, Barzegar, Sasamoto, and Kung**

Claim 9 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Barzegar, Sasamoto, and further in view of U.S. Patent No. 6,826,173 to Kung et al. ("Kung"). The Applicants respectfully traverse the rejections.

Claim 9 is dependent upon claim 1, and is allowable for at least the same reasons as claim 1.

Claim 9 recites, *inter alia*, a system and method of establishing a Transmission Control Protocol/Internet Protocol (TCP/IP) network connection between at least one physical registered message router and at least one physical server based on an indirect message router table that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of the at least one physical server. As discussed above, Ramasubramani, Barzegar, and Sasamoto, either alone or in combination, fail to disclose, teach or suggest such features.

Kung was relied on to allegedly teach a system with multiple protocol gateways that communicate using SNMP communications. (see Office Action, page 8) But, Kung fails to mention use of a router table, much less disclose, teach or suggest an indirect message router table that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of at least one server, as recited by claim 9.

Thus, Ramasubramani, Barzegar, Sasamoto, and Kung, either alone or in combination, fail to disclose, teach or suggest a system and method of establishing a Transmission Control Protocol/Internet Protocol (TCP/IP) network connection between at least one physical registered message router and at least one physical server based on an indirect message router table that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of the at least one physical server, as recited by claim 9.

Accordingly, for at least all the above reasons, claim 9 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

#### **Claims 10 and 21 over Ramasubramani, Barzegar, Sasamoto, and Boyle2**

Claims 10 and 21 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Barzegar, and Sasamoto, and further in view of U.S. Patent No. 6,138,158 to Boyle et al. ("Boyle2"). The Applicants respectfully traverse the rejections.

Claims 10 and 21 are dependent upon claims 1 and 13 respectively, and are allowable for at least the same reasons as claims 1 and 13.

Claims 10 and 21 recite, *inter alia*, a system and method of establishing a Transmission Control Protocol/Internet Protocol (TCP/IP) network connection between at least one physical registered message router and at least one physical server based on an indirect message router table that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of the at least one physical server. As discussed above, Ramasubramani, Barzegar, and Sasamoto, either alone or in combination, fail to disclose, teach or suggest such features.

Boyle2 was relied on to allegedly a maximum segment size, determining if a message exceeds the maximum segment size, and segmenting a message into a plurality of message segments, with none of the plurality of message segments exceeding the maximum segment size. (see Office Action, page 9) But, Boyle2 fails to mention use of a router table, much less disclose, teach or suggest an indirect message router table that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of at least one server, as recited by claims 10 and 21.

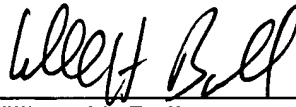
Thus, Ramasubramani, Barzegar, Sasamoto, and Boyle2, either alone or in combination, fail to disclose, teach or suggest a system and method of establishing a Transmission Control Protocol/Internet Protocol (TCP/IP) network connection between at least one physical registered message router and at least one physical server based on an indirect message router table that maps a message key, including at least one of a service type and a message identification (ID), to an IP address of the at least one physical server, as recited by claims 10 and 21.

Accordingly, for at least all the above reasons, claims 10 and 21 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "William H. Bollman", written over a horizontal line.

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